

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors. ¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION TO INFORM BRISTOL-MYERS SQUIBB P.R., INC.'S
APPEARANCE AT THE MAY 18-19, 2022 OMNIBUS HEARING**

COMES NOW Bristol-Myers Squibb P.R., Inc. ("BMS"), defendant in Adversary Case No. 19-00042-LTS (the "Action"), and a party-in-interest under 11 U.S.C. § 1109(b), by and through the undersigned legal counsel, and respectfully submits this motion in compliance with the Court's *Order Regarding Procedures for May 18-19, 2022 Omnibus Hearing* (Dkt. No. 20687) (the "Scheduling Order"):

1. Nayuan Zouairabani of McConnell Valdés, LLC will appear on behalf of BMS at the May 18-19, 2022 omnibus hearing (the "Hearing"), which will be conducted virtually via videoconferencing (Zoom) and telephonic platforms.

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Building Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. The email address of Mr. Zouairabani is nzt@mcvpr.com. Further, Mr. Zouairabani hereby submits his Party Appearance Cover Sheet as **Exhibit A** to this motion.

3. Mr. Zouairabani may present oral argument related to the following pleadings:

- a. *Omnibus Motion by the Avoidance Actions Trustee to Establish Litigation Case Management Procedures* (Dkt. No. 20560);
- b. *Limited Objection and Reservation of Rights to Omnibus Motion by the Avoidance Actions Trustee to Establish Litigation Case Management Procedures* (Dkt. No. 20665);
- c. *Bristol-Myers Squibb P.R., Inc. Partial Joinder to Limited Objection and Reservation of Rights to Omnibus Motion by the Avoidance Actions Trustee to Establish Litigation Case Management Procedures* (Dkt. No. 20665) (Dkt. No. 20669); and
- d. Any other responses or motions related to the foregoing.

4. BMS further reserves the right to be heard and present oral argument on any matter identified in the agenda to be filed by the Oversight Board by May 16, 2022, or to address any statement or issue that may be raised by any party at the Hearing related to the Title III cases, the Action, or any other proceeding which may affect the interests of BMS. BMS also reserves the right to amend this motion as needed.

WHEREFORE, BMS respectfully requests the Court to take note of the foregoing and deem it in compliance with the Scheduling Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 9th day of May, 2022.

CERTIFICATE OF SERVICE: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's *Sixteenth Amended Notice, Case Management and*

Administrative Procedures Order (Dkt. No. 20190-1) (the “CMP Order”), we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

Attorneys for Bristol-Myers Squibb P.R., Inc.

MCCONNELL VALDÉS LLC
270 Muñoz Rivera Avenue, Suite 7
Hato Rey, Puerto Rico 00918
Telephone: 787-250-5632
Facsimile: 787-759-9225

By: /s/Nayuan Zouairabani
Nayuan Zouairabani
USDC No. 226411
Email: nzt@mcvpr.com

EXHIBIT A
PARTY APPEARANCE SHEET

Name of Party	Bristol-Myers Squibb P.R., Inc.
Party Name Abbreviation (For Use with Zoom)	BMS
<p>Confirmation Hearing Participants</p> <p>Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party):</p> <ul style="list-style-type: none"> • Name, • Email, • Law Firm, • Phone Number • Docket Entry No. for the Attorney’s Notice of Appearance • Zoom Screen Name (<u>See</u> December Omnibus Hearing procedures Order, ¶ 8(a)) <p>Nayuan Zouairabani-Trinidad nzt@mcvpr.com McConnell Valdés, LLC 787-250-5619 Docket Entry: 20668 BMS / Zouairabani, Nayuan / McConnell Valdés, LLC</p>	
If a Party files a supplemental Party Appearance Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a “Supplemental” Party Appearance Sheet.	
<p>Note: Pursuant to the December Omnibus Hearing Procedures Order ¶ 1, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other party-in-interest shall be limited to 2 attorneys at any given time.</p>	